



Israel Klein, Esq.  
Direct Dial: (646) 767-2265  
Facsimile: (212) 658-9177  
E-mail: [Israel@lawicm.com](mailto:Israel@lawicm.com)

May 2, 2018

**VIA ECF**

Hon. Roslynn R. Mauskopf  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Muladzhhanov v. City of New York, et. al.*,  
Case No.: 18-CV-00930 (RRM-ST)

Dear Judge Mauskopf:

Our firm represents the Plaintiff Abram Muladzhhanov ("Plaintiff" or "Mr. Muladzhhanov") and submits this letter in response to Defendants The City of New York's, Commissioner Polly Trottenberg's, Commissioner Jacques Jiha's and Deputy Commissioner Jeffrey Shear's (collectively, "Defendants") pre-motion conference letter (Doc. No. 16).

Plaintiff intends to file an Amended Complaint in which he will plead additional facts and join additional parties. Counsel for Defendants has consented to the filing of Plaintiffs' Amended Complaint on or before May 31, 2018. Plaintiff respectfully requests that the Court deny Defendants' request for a pre-motion conference with leave to renew after the filing of Plaintiffs' Amended Complaint.

Respectfully submitted,

/s/ Israel Klein  
Israel Klein, Esq.